

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DEAN KAMPAS,

Defendant.

JUDGE COAR

DOCKETED
OCT 27 2003

Civil No. 03C 7536

MAGISTRATE JUDGE KEYS

COMPLAINT

FILED-EDS
OCT 24 PM 12:47
CLERK
U.S. DISTRICT COURT

The United States of America, by its attorney, Patrick J. Fitzgerald, United States Attorney for the Northern District of Illinois, brings this civil action to collect unpaid trust fund recovery penalties assessed against Dean Kampas, pursuant to §§ 7401 and 7402 of the Internal Revenue Code (26 U.S.C.) at the direction of the Attorney General of the United States and with the authorization of the Chief Counsel of the Internal Revenue Service, a delegate of the Secretary of the Treasury. For its Complaint, the United States alleges as follows:

1. This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1340 and 1345, and 26 U.S.C. §§ 7402(a).
2. Upon information and belief, Dean Kampas resides at 8648 West 145th Place, Orland Park, Illinois, 60462, within the jurisdiction of this Court.
3. On July 8, 1996, a delegate of the Secretary of the Treasury made an assessment against Dean Kampas, in the amount of \$93,320.82, pursuant to 26 U.S.C. § 6672, as a responsible person who willfully failed to collect, truthfully account for, or pay over income and Federal Insurance Contributions Act (FICA) taxes withheld from the wages of the employees of Bradley

1-1


Gardens, Inc. for the quarters ending March 31, 1991, through and including the quarter ending June 30, 1993.

4. Pursuant to the assessment described in paragraph 3, above, a delegate of the Secretary of the Treasury issued a notice of assessment to, and made demands for the payment thereof upon, Dean Kampas. Despite said notice and demand, he has refused or neglected to pay in full the assessed liability. As of February 24, 2000, there remains due and owing the United States with respect to the assessments described in paragraph 3, the sum of \$135,510.27, less any abatements and payments made, plus statutory interest.

WHEREFORE, the United States of America prays that the Court:

- a. Enter a judgment in favor of the United States and against Dean Kampas in the amount of \$135,510.27, plus statutory additions from February 24, 2000.
- b. Award the United States its costs and such other further relief as the Court deems just and proper.

PATRICK J. FITZGERALD
United States Attorney



CRAIG K. WEAVER
Trial Attorney, Tax Division
U.S. Department of Justice
Post Office Box 55
Ben Franklin Station
Washington, D.C. 20044
Telephone: (202) 307-6416

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOISCivil Cover Sheet

This automated JS-44 conforms generally to the manual JS-44 approved by the Judicial Conference of the United States in September 1974. The data is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. The information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is authorized for use only in the Northern District of Illinois.

Plaintiff(s): UNITED STATES OF AMERICA Defendant(s): DEAN KAMPAS

County of Residence:

County of Residence:

Plaintiff's Atty: CRAIG K. WEAVER
DEPARTMENT OF JUSTICE
555 4TH STREET, NW,
WASHINGTON, DC 20001
(202)307-6416

Defendant's Atty:

DOCKETED

OCT 27 2003

03C 7536

II. Basis of Jurisdiction:

1. U.S. Gov't Plaintiff

JUDGE COAR

III. Citizenship of Principal
Parties (Diversity Cases Only)Plaintiff: - N/A
Defendant: - N/A

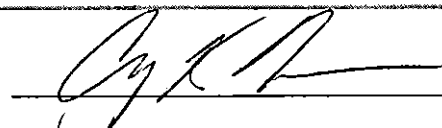
MAGISTRATE JUDGE KEYS

FILED-EDS
03 OCT 24 PM 12:47
CLERK
U.S. DISTRICT COURTIV. Origin :

1. Original Proceeding

V. Nature of Suit:

870 Taxes US Plaintiff or Defendant

VI. Cause of Action:U.S.C. 26 section 7401 & 7402 Unpaid Trust Fund Recovery
PenaltiesVII. Requested in ComplaintClass Action:
Dollar Demand:
Jury Demand:VIII. This case IS NOT a refiling of a previously dismissed case.Signature: 

Date: 10/15/2003

If any of this information is incorrect, please go back to the Civil Cover Sheet Input form using the *Back* button in your browser and change it. Once correct, print this form, sign and date it and submit it with your new civil action. **Note: You may need to adjust the font size in your browser display to make the form print properly.**

Revised: 06/28/00

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

In the Matter of

EASTERN DIVISION

JUDGE COAR

UNITED STATES OF AMERICA
v.
DEAN KAMPAS

DOCKETED

OCT 27 2003

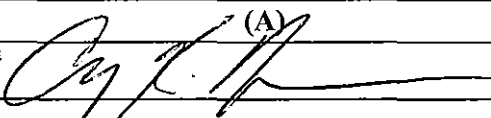
Case Number:

03C 7536

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR:

UNITED STATES OF AMERICA

MAGISTRATE JUDGE KEYS

(A)		(B)	
SIGNATURE 		SIGNATURE	
NAME CRAIG K. WEAVER		NAME	
FIRM DEPARTMENT OF JUSTICE		FIRM	
STREET ADDRESS 555 4TH STREET, NW, RM 7804		STREET ADDRESS	
CITY/STATE/ZIP WASHINGTON, DC 20001		CITY/STATE/ZIP	
TELEPHONE NUMBER (202) 307-6416	FAX NUMBER (202) 514-5238	TELEPHONE NUMBER	FAX NUMBER
E-MAIL ADDRESS CRAIG.K.WEAVER@USDOJ.GOV		E-MAIL ADDRESS	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)	
MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/>	
TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>	
		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	
(C)		(D)	
SIGNATURE		SIGNATURE	
NAME		NAME	
FIRM		FIRM	
STREET ADDRESS		STREET ADDRESS	
CITY/STATE/ZIP		CITY/STATE/ZIP	
TELEPHONE NUMBER	FAX NUMBER	TELEPHONE NUMBER	FAX NUMBER
E-MAIL ADDRESS		E-MAIL ADDRESS	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)	
MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/>		MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/>	
TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>		TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>	
DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	

FILED-ED5
03 OCT 24 PM 12:47
CLERK
U.S. DISTRICT COURT

13